

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Hon: Mark A. Goldsmith

Civil Action No: 13-11968-cv

LINDSAY MIDDLETON,

Plaintiff,

V.

KEVIN C. BOLLAERT,

ERIC C. CHANSON,

ROY E. CHANSON,

AMY L. CHANSON, and

BLUE MIST MEDIA, LLC, a limited liability
company of unknown origin d/b/a "UGOTPOSTED"

Defendants.

Ari Lehman (P68862)

Lehman Law PLLC

Attorney For Plaintiff

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Novi, MI 48375

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AFFIDAVIT IN SUPPORT OF DAMAGES

1) I, Lindsay Middleton, am a Michigan resident over the age of 18 years-old and competent to testify.

2) If called upon to testify, I could testify as to my actual knowledge of the events stated below.

3) After my private photos and my personal information were illegally posted on Ugotposted.com, I suffered various damages in the form of harassment, humiliation, embarrassment, emotional distress, and potential lost future employment and promotion opportunities.

4) The private and copyrighted photos were viewed by both family members, friends, and work colleagues both current and former.

5) I had numerous strangers flood my Facebook account, which was also posted on the site, and I had to remove that Facebook page because of the non-stop harassment.

6) As a result of the illegal acts of defendants, someone posted me on the website Craig's List twice, with my phone number, (which would have been accessible from Facebook), and an advertisement stating that I was interested in getting "Big Black Cock" tonight.

7) As a result, I received over 300 photos of male genitalia, often coming to me while I was at work.

8) I had to change my phone number as a result of this.

9) This horror has made me not trust people, and caused me severe emotional distress.

10) People continue to talk whisper about me when I go out, and I feel like I am no longer accepted by my friends.

11) While I have not yet lost any wages as a result, the harm that this may have done to future promotions, and job prospects has caused me much anxiety.

12) I am asking for \$10,000 per unauthorized photographs or \$50,000 (there were five unauthorized photographs posted), \$50,000 for emotional distress, \$50,000 for lost future wages, \$150,000 for punitive damages, and attorney fees.

13) And while the posting of my pictures and personal information were removed once the lawsuit was filed, I fear that without an injunction the information could be posted again.

14) Therefore, I request a permanent injunction barring defendants from ever posting

information about me or my photographs on an internet website, unless authorized by me to do so.

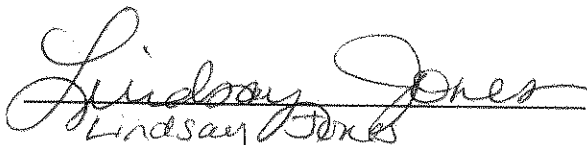
Dated: July 29, 2013



Lindsay Middleton

Subscribed and sworn to before me this

29th day of July, 2013


Lindsay Jones
Notary Public

LINDSAY JONES
NOTARY PUBLIC, STATE OF MI
COUNTY OF WAYNE
MY COMMISSION EXPIRES Aug 15, 2013
ACTING IN COUNTY OF Oakland